

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA	:	<u>3500 PROTECTIVE ORDER</u>
	:	
- v. -	:	20 Cr. 653 (RA)
	:	
DJONIBEK RAHMANKULOV,	:	
	:	
Defendant.	:	
	:	
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Upon the application of the United States of America, Damian Williams, United States Attorney for the Southern District of New York, by and through Samuel L. Raymond, Thane Rehn, Cecilia E. Vogel, Assistant United States Attorneys, of counsel, for an order precluding the dissemination of material produced pursuant to 18 U.S.C. § 3500 and/or *Giglio v. United States*, 405 U.S. 150 (1972) ("3500 Material"), and providing additional protections to a designated subset of the 3500 Material which has been classified as "Attorneys' Eyes Only," (the "Attorneys' Eyes Only 3500 Material"), made on consent of defense counsel, and based on the Court's independent review,

IT IS HEREBY ORDERED that (1) defense counsel must destroy or return to the Government all 3500 Material (and any copies thereof) at the conclusion of the trial of this matter or when any appeal has become final; (2) defense counsel and the

defendant are precluded from disseminating any of the 3500 Material to anyone beyond the defendant, defense counsel, and any paralegal or staff employed by the defense teams; and (3) The defense may review 3500 Material with any witnesses who agree to be bound by the terms of this Order but such witnesses may not retain copies of the 3500 Material, and the defense must further keep a record of any witness(es) shown 3500 Material.

IT IS FURTHER ORDERED that any 3500 Material having been clearly designated as "Attorneys' Eyes Only 3500 Material," including any copies thereof or excerpts therefrom, or any information contained therein, shall not be disclosed to or possessed by the defendant, and may be disclosed only to defense counsel and to any paralegal or staff employed by the defense. If defense counsel determines that the "Attorneys' Eyes Only 3500 Material" is material and relevant to the investigation and defense of his client, and requires counsel to share the information subject to this protective order with his client, counsel for the defendant reserve the right, on notice to the Government, to seek

permission from the Court to do so.

Dated: New York, New
York July 27, 2022

A handwritten signature in blue ink, consisting of a stylized 'R' followed by a horizontal line.

THE HONORABLE RONNIE ABRAMS
UNITED STATES DISTRICT JUDGE